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April 21, 2023

VIA ECF

The Honorable Michael A. Shipp, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re:   *B.Y.C.C. v. United States*, No. 22-cv-06586 (MAS) (DEA)  
      *J.A.L.C. v. United States*, No. 22-cv-06587 (MAS) (DEA)  
      *R.J.P. v. United States*, No. 22-cv-06588 (MAS) (DEA)**

Dear Judge Shipp:

This law firm is pro bono counsel to Plaintiffs in the above-referenced matters. With the consent of Defendant United States of America (“Defendant”), we write to respectfully request permission, pursuant to Local Civil Rule 7.2(b), for leave to file one, consolidated 105-page brief in opposition to the three separate motions to dismiss (the “Motions”) filed by Defendant on March 6, 2023. Plaintiffs’ oppositions to the Motions are due on May 2, 2023.

As the Court is aware, Defendant sought and received permission to file overlength briefs in support of its motions to dismiss. Specifically, Defendant filed a 57-page brief in *B.Y.C.C.*, a 56-page brief in *J.A.L.C.*, and a 50-page brief in *R.J.P.* Collectively, Defendant filed 163 pages—a more than 40% increase over the 90 pages permitted under the Local Rules. To thoroughly address all of Defendant’s arguments, Plaintiffs request leave to file an overlength, consolidated brief of no more than 105 pages. As the Motions present substantially similar (and in some instances identical) legal issues, consolidation will avoid unnecessary duplication of arguments and facts.

We thank the Court for its attention to this matter. Should the Court require any additional information or have any questions, please do not hesitate to contact us.

Respectfully submitted,

So Ordered.

s/ Natalie Kraner  
Natalie Kraner

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The Honorable Michael A. Shipp, U.S.D.J

Date:

cc:   All Counsel of Record (via ECF)